

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

JAMES MICHAEL LITTLE,  
Debtor

YORK HAVEN SEWER AUTHORITY,  
Movant

vs.

JAMES MICHAEL LITTLE,  
Respondent

Chapter 13

Case No. 1:23-bk-02273-HWV

OBJECTION OF YORK HAVEN SEWER AUTHORITY  
TO CONFIRMATION OF CHAPTER 13 PLAN

COMES NOW, this 16<sup>th</sup> day of February, 2024, York Haven Sewer Authority, by and through its attorneys, CGA Law Firm P.C., Craig S. Sharnetzka, Esquire, and respectfully represents the following:

PARTIES

1. Movant is the York Haven Sewer Authority (hereinafter "Movant"), a municipal authority organized and existing under the laws of the Commonwealth of Pennsylvania with a mailing address of P.O. Box 394, York Haven, Pennsylvania 17370. Movant is represented by CGA Law Firm, Craig S. Sharnetzka, Esquire, 135 North George Street, York, Pennsylvania 17401.

2. The Respondent is the within Debtor, James Michael Little (hereinafter "Debtor"). Debtor is represented by Cibik Law, P.C., Michael A. Cibik, Esquire, 1500 Walnut Street, Suite 900, Philadelphia, Pennsylvania 19102.

3. Jack N. Zaharopoulos, Esquire (hereinafter "Trustee"), has been duly appointed and qualified to act as the Trustee in the within bankruptcy case and maintains an office at 8125 Adams Drive, Suite A, Hummelstown, Pennsylvania 17036.

BACKGROUND

4. Debtor filed the within case as a voluntary Chapter 13 on October 3, 2023.

5. At all relevant times Movant has provided sewer services to Debtor.

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## OBJECTION

6. Movant objects to the Debtor's First Amended Chapter 13 Plan for the following reasons:

a. Movant is not listed as a creditor, and as such had no knowledge about the filing of the within case;

b. Movant is filing a Proof of Claim contemporaneously with the filing of the within Objection in the amount of \$3,013.65, which claim is secured in Debtor's real estate;

c. Debtor's First Amended Chapter 13 Plan does not provide for the treatment of the pre-petition balance owed to Movant; and

d. Debtor has not paid the post-petition invoice owed to Movant and has not provided for the future treatment of Movant in the First Amended Chapter 13 Plan.

WHEREFORE, York Haven Sewer Authority requests that this Honorable Court deny confirmation of the Debtor's First Amended Chapter 13 Plan.

Respectfully submitted,

CGA Law Firm P.C.

/s/Craig S. Sharnetzka, Esquire

Craig S. Sharnetzka, Esquire

Supreme Court No. 83863

135 North George Street

York, Pennsylvania 17401

Telephone: (717) 848-4900

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CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on February 16, 2024, a true and correct copy of the attached Objection was served upon the following parties in the following manner:

Name	Mode of Service
Jack N. Zaharopoulos, Chapter 13 Trustee	Via CM/ECF
Michael A. Cibik, Esquire	Via CM/ECF

I certify under penalty of perjury that the forgoing is true and correct.

Date: February 16, 2024

/s/Craig S. Sharnetzka, Esquire  
Craig S. Sharnetzka, Esquire

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